

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PUBLIC EMPLOYEES' RETIREMENT
ASSOCIATION OF COLORADO, TENNESSEE
CONSOLIDATED RETIREMENT SYSTEM,
SJUNDE AP-FONDEN, FJÄRDE AP-FONDEN, and
PENSJONSKASSERNES ADMINISTRATION A/S,
Individually and On Behalf of All Others Similarly
Situated,

Plaintiffs,
v.

CITIGROUP INC., CHARLES O. PRINCE, SALLIE L.
KRAWCHECK, GARY L. CRITTENDEN, TODD S.
THOMSON, ROBERT DRUSKIN, THOMAS G.
MAHERAS, MICHAEL STUART KLEIN, DAVID C.
BUSHNELL, JOHN C. GERSPACH, STEPHEN R.
VOLK, GEORGE DAVID and KPMG LLP,

Defendants.

TILLIE SALTZMAN, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,
vs.

CITIGROUP INC., CHARLES O. PRINCE, ROBERT
E. RUBIN, STEPHEN R. VOLK, SALLIE L.
KRAWCHECK, GARY L. CRITTENDEN and
ROBERT DRUSKIN,

Defendants.

LENNARD HAMMERSCHLAG, Individually, and On
Behalf of All Others Similarly Situated,

Plaintiff
v.

CITIGROUP INC., CHARLES PRINCE, SALLIE
KRAWCHECK, and GARY CRITTENDEN,

Defendants.

No.

Electronically Filed

No. 1:07-cv-9901(SHS)

ECF CASE

Electronically Filed

No. 1:07-cv-10258(SHS)

ECF CASE

**THE GLOBAL PENSION FUNDS' NOTICE OF MOTION AND MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFFS,
AND APPROVAL OF CO-LEAD COUNSEL**

PLEASE TAKE NOTICE that on a date and time as may be set by the Court, before the Honorable Sidney H. Stein, at the United States District Court for the Southern District of New York, located at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 23A, New York, New York 10007-1312, Plaintiffs, Public Employees' Retirement Association of Colorado, Tennessee Consolidated Retirement System, Sjunde AP-Fonden, Fjärde AP-Fonden, and Pensionskassernes Administration A/S (collectively, the "Global Pension Funds"), will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the "Exchange Act"), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for entry of an Order: (1) consolidating all the above-captioned actions and any related actions that may be filed under Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing the Global Pension Funds as Lead Plaintiffs in the consolidated actions; (3) approving the Global Pension Funds' selection of Entwistle & Cappucci LLP and Schiffрин Barroway Topaz & Kessler, LLP as Co-Lead Counsel for the Class; and (4) granting such other and further relief as the Court may deem just and proper.

The Global Pension Funds purchased shares of Citigroup Inc. common stock during the period from January 2, 2004 through November 21, 2007 (the "Class Period"). The Global Pension Funds believe that, collectively, they have the largest financial interest in the relief sought by the Class and thus should be appointed Lead Plaintiffs. Each of the Global Pension Funds has extensive experience as a fiduciary, and Colorado PERA has extensive experience leading securities class actions.

In addition, the Global Pension Funds meet the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of other Class members' claims and because they will fairly and adequately represent the interests of the Class. Furthermore, the appointment of the Global Pension Funds as Lead Plaintiffs would advance the primary goal of the PSLRA's lead plaintiff provisions, namely, to encourage institutional investors with large financial stakes in the outcome of the litigation to assume control over securities class actions.

This Motion is supported by the accompanying Memorandum of Law in support thereof, the Declaration of Andrew J. Entwistle filed herewith, the pleadings and other filings, and such other written and oral argument as may be permitted by the Court.

For the foregoing reasons, the Global Pension Funds respectfully request that the Court (1) consolidate all the above-captioned actions and any related actions that may be filed; (2) appoint the Global Pension Funds as Lead Plaintiffs pursuant to the PSLRA; (3) approve Entwistle & Cappucci LLP and Schiffрин Barroway Topaz & Kessler, LLP as Co-Lead Counsel for the Class; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: January 7, 2008

Respectfully,

ENTWISTLE & CAPPUCCI LLP

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